ADEQ

ARKANSAS
Department of Environmental Quality

October 7, 2013

U.S. EPA Region 6
Attention Stephen Tzhone, RPM
Mail Code 6SF
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: Cleanup Standards for Groundwater and Surface Water; Arkwood Superfund Site, Omaha, Arkansas; EPA ID No. ARD084930148; AFIN 05-00003

Dear Mr. Tzhone:

The Arkansas Department of Environmental Quality-Hazardous Waste Division and Water Division (ADEQ) have again reviewed the Administrative Record for the Arkwood site and are restating our position regarding the remedial levels and criteria for the site. The maximum contaminant level (MCL) should be applied to groundwater beneath and near the site. The Arkansas Water Quality Standard (WQS) should be applied to surface water. ADEQ and EPA agree that not all of the groundwater flows to New Cricket Spring. The applicable standard depends on the receptor and the point of contact.

As discussed on several conference calls recently and as documented in the Record of Decision (ROD), the EPA put forth the remedial goal for pentachlorophenol (PCP) in groundwater as the MCL. In 1990 the MCL for PCP was a provisional number and was set at 1.01 mg/L. Because the PCP contaminated groundwater was determined to surface in New Cricket Spring, the Arkansas WQS was calculated. Using the nearest water quality monitoring point, the calculated level was set at 18.7 ug/L. In 1991, EPA established an MCL of 0.001 mg/L for PCP.

A Memorandum was sent to the file from EPA regarding the MCL for PCP as it was used to calculate the soil target action level. It was determined that the soil target action level would be protective. EPA also determined the scheduled review of two years of groundwater monitoring and the Five Year Reviews would be an adequate check for identification of any potential problems. In 1994, in response to a request to plug and abandon the groundwater monitoring wells at the site, ADEQ expressed concern that levels of PCP in New Cricket Spring were above the Arkansas WQS. ADEQ also noted the soil clean up level was based on the provisional MCL of 1 mg/L and not the current MCL of 1 ug/L.

The current MCL of 1ug/L for PCP should be applied to groundwater. Groundwater is water below the surface of the earth. The Arkansas WQS of 15.57 ug/L for PCP should be applied to surface water. The MCL could be applied if the surface water is or could potentially be used as a drinking water source. Because the water which exits the ozone treatment system via a weir into a ditch reenters the groundwater system, ADEQ has requested McKesson apply a reporting limit of 1 ug/L. McKesson has agreed to do this. ADEQ has also requested McKesson to collect pH,

temperature, and dissolved oxygen levels when collecting surface water samples. McKesson has agreed to do this. The site specific Arkansas WQS was re-calculated as part of the third five year review. Water quality data from a state water quality sampling station in the same water shed as the site was used. The re-calculated chronic WQS is now 15.57 ug/L.

ADEQ still holds the opinion the MCL of 1 ug/L for PCP is a federal standard and should be applied to groundwater. The Arkansas WQS of 15.57 ug/L for PCP is a state standard and should be applied to surface water.

All applicable or relevant regulatory changes are reviewed during the five year review of the site. The next five year review is due March 31, 2016. Should you have any questions regarding this correspondence, please contact me at 501-682-0844 or by e-mail at kilburn@adeq.state.ar.us.

Sincerely,

Dianna Kilburn, P.G.
Geologist Supervisor
Hazardous Waste Division